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2017 OCT 10 AM 9:41

OFFICE OF GENERAL
COUNSEL

MUR # 7283

Office of General Counsel,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463

Complainant:
Mike Keeling (Keeling Campaign Committee)
P.O. Box 1052
Asbury Park, NJ 07712

Dear Counsel,

This formal complaint is in regards to blatant violations to FEC laws and Constitutional law, specifically the raising and spending of money and formal declaration of candidacy without filing with the FEC and without having established residency within the state of candidacy.

Josh Welle and his campaign committee, Josh Welle for Congress (P.O. Box 8801, Red Bank, NJ 07701), have been raising and spending money without filing with the FEC as a declared candidate and without having established residency in the State of New Jersey.

The website <https://welleforcongress.com> states that the campaign fund, Josh Welle for Congress, has paid for the listed website. If this is the case, the spending and raising of money has been occurring by the campaign for many weeks prior to this complaint.

Josh Welle has spoken at several events in New Jersey as a candidate and was introduced to a group of two hundred constituents as a Federal Candidate by Matt Anderson of the Monmouth County Democrats.

I have called the FEC and neither Josh Welle or Josh Welle for Congress has filed any paperwork with the FEC. I have taken multiple screen shots of the FEC's website with the dates which show no listing under this candidate or his campaign committee.

In this article, *Observer* announces his Federal Campaign: *Observer*, www.observer.com. "Democrat Seeks to Unseat Chris Smith in NJ," by Christian Hetrick <http://observer.com/2017/09/democrat-seeks-to-unseat-chris-smith-in-nj/> (accessed on Sept 27th, 2017).

In the article, it states Josh is running in New Jersey's 4th district but does not live in the state: "He most recently lived in Arlington, VA and is currently staying with family in Red Bank (NJ) before he moves to Manasquan (NJ)." Raising and spending money as a federal candidate and announcing to the press that you are a federal candidate is a violation of FEC law when the candidate has neither filed with the FEC nor established residency in the state in which he/she is running. Running for the U.S. House of Representatives without living in the state you are running in is in violation of U.S. Constitutional law regarding elections.

This article Ballotpedia shows Josh Welle listed as a Republican: Ballotpedia, ballopedia.org. "Josh Welle New Jersey's 4th Congressional District," by Justin Haas, https://ballotpedia.org/Josh_Welle (accessed September 28th, 2017).

It was then edited the next day to say Josh Welle is a Democrat.

Ballotpedia, ballopedia.org. "Josh Welle New Jersey's 4th Congressional District," by Justin Haas, https://ballotpedia.org/Josh_Welle (accessed September 29th, 2017).

What paperwork was looked at by this publication to make the claim that Josh Welle was running for office? What paperwork was looked at to decide if Josh Welle is running as a Democrat or a Republican? Why would it be switched? How can the proper paperwork have already been filed if Josh Welle doesn't currently have a New Jersey address? How can Josh Welle live in Virginia and run in New Jersey without a driver's license, address, or bills to a residence (proof of residence) under Josh Welle's name?

The fact that the paperwork hasn't been filed with the FEC and on their website by today (Oct. 2, 2017) should be enough for a violation. The fact that he isn't a resident is also a violation of multiple laws. Proof of residency, proper paperwork, home addresses, driver's license issue dates, and bills to an address that the candidate has listed as his home address on his campaign paperwork are needed to prove these violations of great substance didn't occur.

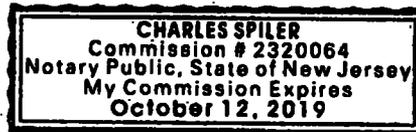
I hope that the General Council will find that these violations are enough to deem Josh Welle and his campaign committee unfit to run in the 2018 Federal elections in New Jersey. I also hope that the Counsel will not limit the violations to only those noted in this complaint, but investigate the full scope of wrongdoing by these parties.

Thank you,

Mike Keeling
Democratic Candidate in New Jersey's 4th District

Michael Keeling

STATE OF: New Jersey
COUNTY OF: Monmouth



Subscribed and affirmed before
me, Charles Spiler, Notary Public,
this 2ND day
of OCTOBER, 2017.

Charles Spiler